

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

ERIN ENERGY CORPORATION,

Debtor.

§ Case No. 18-32106

§ Chapter 11

In re:

ERIN ENERGY LIMITED,

Debtor.

§ Case No. 18-32107

§ Chapter 11

In re:

ERIN ENERGY KENYA LIMITED,

Debtor.

§ Case No. 18-32108

§ Chapter 11

In re:

**ERIN PETROLEUM NIGERIA
LIMITED,**

Debtor.

§ Case No. 18-32109

§ Chapter 11

§ Joint Administration Pending

NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE

The above captioned debtors and debtors in possession (collectively, the “Debtors”) each filed for bankruptcy on April 25, 2018. The undersigned party in interest believes that this case qualifies as a complex chapter 11 case because:

The Debtors have total debt of more than \$10 million;

There are more than 50 parties in interest in these cases;

The Debtors' equity is publicly traded;

Other (Substantial explanation is required.) A significant portion of the Debtors' assets are located in foreign jurisdictions and a significant portion of the Debtors' assets are subject to liens granted under the laws of other countries.

Respectfully submitted on the 25th day of April, 2018.

Respectfully submitted,

OKIN ADAMS LLP

By: /s/ Matthew S. Okin
Matthew S. Okin
Texas Bar No. 00784695
mokin@okinadams.com
David L. Curry, Jr.
Texas Bar No. 24065107
dcurry@okinadams.com
John Thomas Oldham
Texas Bar No. 24075429
joldham@okinadams.com
Ryan A. O'Connor
Texas Bar No. 24098190
roconnor@okinadams.com
1113 Vine St., Suite 201
Houston, Texas 77002
Tel: 713.228.4100
Fax: 888.865.2118

**PROPOSED ATTORNEYS FOR THE
DEBTORS**